

Western Sierra Medical Clinic

Better Health Together



wsmcmed.org 530-274-WSMC

ADMINISTRATIVE OFFICE

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May 16, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Received & Inspected

MAY 22 2018

FCC Mailroom

WC 62-601
WC 17-310

DOCKET FILE COPY ORIGINAL

Re: Rural Health Care Program: Request to Promptly Approve Emergency Petition for Waiver of the Funding Cap Pending Conclusion of the Open Rulemaking

Dear Ms. Dortch,

As Chief Executive Officer of Western Sierra Medical Clinic, Inc. in northeastern California, I am writing to strongly urge the Commission to approve the Emergency Petition for Waiver of the Rural Health Care Program (RHCP) Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

Western Sierra Medical Clinic, a Federally Qualified Health Center, currently operates seven health centers, which provide primary health care to the medically underserved rural and frontier areas in four counties covering nearly 4,000 square miles, from the Sacramento Valley to Lake Tahoe and the Sierra Nevada Mountains. Our nonprofit community health center is a vital safety-net provider serving one of every four residents of Nevada and Sierra counties, and has recently expanded into Placer County. We expect more than 70,000 patient visits this year.

Western Sierra participates in the Rural Health Care Program (RHCP), which makes it possible for us to offset the costs of broadband access that is so critical to enabling us to be accessible to patients, and efficient and cost-effective.

We rely on broadband for our electronic medical records system to collect and store patient information and to share information with other medical providers in a digital format. Broadband enables us to provide telehealth services that make it possible to bring more care to people in our rural region via telecommunications technologies.

The Federal Communications Commissions' proposed cuts to the RHCP would mean reductions between 15% -- 25% for health care providers. For Western Sierra, this would mean an increase in costs of between \$17,000 and \$28,000 annually for our Internet and phone system services.

Nevada County

844 Old Tunnel Road, Grass Valley, CA 95945
10544 Spenceville Road, Penn Valley, CA 95946
CoRR, 180 Sierra College Drive, Grass Valley, CA 95945

Placer County

3111 Professional Drive, Auburn, CA 95603
12183 Locksley Lane, Suite 106, Auburn, CA 95602
Kings Beach-Tahoe, 8665 Salmon Ave., Kings Beach, CA 96143

Sierra County

209 Nevada Street, Downieville, CA 95936

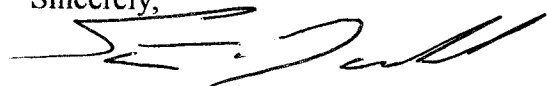
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Western Sierra Medical Clinic strongly urges the FCC to promptly approve the Emergency Petition for Waiver of the RHCP Funding Cap Pending Conclusion of the Open Rulemaking, for the following reasons:

- The reductions in FY2017 RHCP payments to rural FQHCs are in direct contradiction to Congress' and HHS' long-standing efforts to expand electronic medical records and telehealth in rural communities.
- The reductions in FY2017 RHCP payments to rural FQHCs are significant, unexpected and largely-retroactive – and particularly difficult for small safety-net providers to absorb.
- Given the size of the FY2017 reductions – and the unpredictability of future payment amounts – many rural FQHCs are considering giving up activities that require broadband access, despite significant pressure from Congress and HHS to engage in these activities.
- Both the \$400 million cap established in 1998 and FCC oversight of the RHCP are outdated, and rural safety-net providers should not be penalized while waiting for the FCC to complete its updates of both.
- Given that rural providers and carriers are presently determining if – and under what terms – they will participate in the RHCP in FY18, the FCC should approve the emergency waiver promptly.

Thank you for your attention to this request, and for your efforts to increase access to care for medically underserved patients in rural areas. Please feel free to contact me directly if you would like additional information.

Sincerely,



Scott McFarland
Chief Executive Officer
Western Sierra Medical Clinic
530-273-3818